

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

MARY LODGE,

Plaintiff,

v.

UNITED HOMES, LLC, UNITED PROPERTY  
GROUP, LLC, YARON HERSHCO, GALIT  
NETWORK, LLC, OLYMPIA MORTGAGE  
CORP., BAYVIEW LOAN SERVICING, LLC,  
BAYVIEW ASSET MANAGEMENT, LLC,  
U.S. BANK, N.A., AS TRUSTEE FOR BAYVIEW  
ASSET-BACKED SECURITIES TRUST SERIES  
2007-30, and BAYVIEW FINANCIAL  
MANAGEMENT CORP.,

Defendants.

Civil Action No.: CV-05-0187  
(KAM)(RLM)

**DECLARATION OF SARA MANAUGH**

I, Sara Manaugh, hereby declare under penalty of perjury that the following is true and correct:

1. I am a member of the Bar of this Court and a Staff Attorney with the Foreclosure Prevention Project at South Brooklyn Legal Services, located at 105 Court Street, Brooklyn, New York 11201. I serve as co-counsel for the plaintiff in the above-captioned action.

2. I submit this Declaration in support of plaintiff's motion *in limine* to exclude certain documents sought to be used by the Bayview defendants.

3. Each piece of evidence disputed in the instant motion is attached to this Declaration.



4. Attached hereto as Exhibit A is a copy of a deed from Edith Bracy to Edith Bracy and Mary Lodge, dated June 10, 1992, bearing Bates numbers B/W MISC. 0875 – B/W MISC. 0876.

5. Attached hereto as Exhibit B is a copy of a mortgage from Edith Bracy and Mary Lodge to Mark Braccia, dated June 10, 1992, bearing identifying numbers B/W MISC. 0870 – B/W MISC. 0874.

6. Attached hereto as Exhibit C is a copy of a mortgage from Edith Bracy and Mary Lodge to Churchill Mortgage Investment Corporation, dated July 16, 1992, bearing identifying numbers B/W MISC. 0861 – B/W MISC. 0869.

7. Attached hereto as Exhibit D is a copy of a mortgage from Mary Lodge and Edith Bracy to Hometrust Mortgage Bankers, dated June 2, 1994, bearing identifying numbers B/W MISC. 0852 – B/W MISC. 0860.

8. Attached hereto as Exhibit E is a copy of a mortgage from Mary Lodge and Edith Bracy to Alliance Funding Company, dated December 18, 1995, bearing identifying numbers B/W MISC. 0843 – B/W MISC. 0851.

9. Attached hereto as Exhibit F is a copy of a deed from Edith Bracy and Mary Lodge to Mary Lodge, dated June 25, 1997, bearing identifying numbers B/W MISC. 0838 – B/W MISC. 0842.

10. Attached hereto as Exhibit G is a copy of a mortgage between Mary Lodge and Mid-Island Equities Corporation, dated June 25, 1997, bearing identifying numbers B/W MISC. 0823 – B/W MISC. 0837.



11. Attached hereto as Exhibit H is a copy of a mortgage between Mary Lodge and Household Finance Realty Corporation, dated March 23, 1998, bearing identifying numbers B/W MISC. 0819 – B/W MISC. 0822.

12. Attached hereto as Exhibit I is a copy of a mortgage between Mary Lodge and Mid-Island Equities Corporation of New York, dated January 1999, bearing identifying numbers B/W MISC. 0807 – B/W MISC. 0818.

13. Attached hereto as Exhibit J is a copy of a mortgage and consolidation agreement between Mary Lodge and Household Finance Realty Corporation of New York, dated June 3, 1999, bearing identifying numbers B/W MISC. 0803 - B/W MISC. 0806.

14. Attached hereto as Exhibit K is a copy of a mortgage and consolidation agreement between Mary Lodge and Household Finance Realty Corporation of New York, dated March 15, 2002, bearing identifying numbers B/W MISC. 0799 - B/W MISC. 0802.

15. Attached hereto as Exhibit L is a true and correct copy of a deed from Mary Lodge to Tiziana Rinaldi, dated November 19, 2002, recorded on December 24, 2002, under Reel No. 5981, pages 2145–2147, in the New York City Register, *available at* [http://a836-acris.nyc.gov/Scripts/DocSearch.dll/ViewImage?Doc\\_ID=FT\\_3100009023910](http://a836-acris.nyc.gov/Scripts/DocSearch.dll/ViewImage?Doc_ID=FT_3100009023910).

Dated: April 6, 2011  
Brooklyn, New York



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